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Judge <u>K</u>	Rec'd
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IN THE UNITED STATES DISTRICT
COURT FOR THE WESTERN DISTRICT
OF VIRGINIA

For use by inmates filing a complaint under CIVIL RIGHTS ACT, 42 U.S.C. §1983

Marquis Robert Wilson
Plaintiff full name1435580
Inmate No.

v.

CIVIL ACTION NO. N/A 7:20CV533-See Attachment A.
Defendant(s) full name(s)

A. Current facility and address: Buckingham Correctional CenterP.O. Box 430 Dillwyn, Va. 23936B. Where did this action take place? GCC, PSCC, GRCC, & Buckingham

C. Have you begun an action in state or federal court dealing with the same facts involved in this complaint?

X Yes _____ No

If your answer to A is Yes, answer the following:

1. Court: U.S. District Court Eastern District of Va.2. Case Number: 1:17-CV-1487

D. Have you filed any grievances regarding the facts of this complaint?

X Yes _____ No

1. If your answer is Yes, indicate the result:

Unfounded

2. If your answer is No, indicate why:

- E. Statement of Claim(s): State briefly the facts in this complaint. Describe what action(s) each defendant took in violation of your federal rights and include the relevant dates and places. **Do not give any legal arguments or cite any cases or statutes.** If necessary, you may attach additional page(s). Please write legibly.

Claim #1 – Supporting Facts – Briefly tell your story without citing cases or law:

- See attachment

Claim #2 – Supporting Facts – Briefly tell your story without citing cases or law:

- F. State what relief you seek from the Court. Make no legal arguments and cite no cases or statutes.

Compensatory & Punitive of \$250,000 each

- G. If this case goes to trial do you request a trial by jury? Yes X . No

- H. If I am released or transferred, I understand it is my responsibility to immediately notify the court in writing of any change of address after I have been released or transferred or my case may be dismissed.

DATED: 8/16/20

SIGNATURE: 

VERIFICATION:

I, Marquis R. Wilson, state that I am the plaintiff in this action and I know the content of the above complaint; that it is true of my own knowledge, except as to those matters that are stated to be based on information and belief, and as to those matters, I believe them to be true. I further state that I believe the factual assertions are sufficient to support a claim of violation of constitutional rights. Further, I verify that I am aware of the provisions set forth in 28 U.S.C. §1915 that prohibit an inmate from filing a civil action or appeal, if the prisoner has, on three or more occasions, while incarcerated brought an action or appeal in federal court that is dismissed on the grounds that it was frivolous, malicious, or failed to state a claim upon which relief may be granted, unless the prisoner is imminent danger of serious physical injury. I understand that if this complaint is dismissed on any of the above grounds, I may be prohibited from filing any future actions without the pre-payment of the filing fees. I declare under penalty of perjury the foregoing to be true and correct.

DATED: 8/16/20

SIGNATURE: 

Attachment A:

Defendants:

- ① Harold W. Clarke - VDOC Director
- ② Dr. Mark Amonette - M.D. VDOC Chief Physician
- ③ Barry Martano - VDOC Statewide ADA Coordinator
- ④ Mr. Woodson - Lead Warden (BKCC)
- ⑤ Mr. J. Snooddy - Assistant Warden (BKCC)
- ⑥ Mr. G. Sink - ADA Coordinator & Unit Manager for C+D building
- ⑦ Major K. Goldman - Chief of Security
- ⑧ Ms. R. Trent - Chief of Housing and Programs
- ⑨ Ms. C. Bryant - Institutional OPR. Mgr.
- ⑩ Dr. Ohio - Institutional Chief Physician
- ⑪ Dr. Quinn - Psychologist
- ⑫ Snr. Mr. J. Lynch - Unit Manager for A+B building
- ⑬ Mr & Mrs John Doe

Attachment B.

Claims

Claim One:

Fourteenth Amendment claim, Eighth Amendment claim cruel and unusual punishment, failure to protect, due to being attacked by inmates that resulted to receiving hearing aids at or about May 19, 2016 (GCC).

Claim Two:

Eighth Amendment claim cruel and unusual punishment, failure to protect, due to staff attack which resulted me in a coma from 2018-2019 and put me in an administrative transfer from (GCC) to (PSCC) for medical treatment of a (EEG) due to Traumatic Brain Injury (TBI).

Claim Three:

Failure to protect and cruel and unusual punishment (deliberate indifference), due to being attacked by correction officer Fowler and Edmonds while in full restraints and shackles and thrown into segregation. Administrative transfer to (GRCC), at or about 2019.

Claim Four:

Fourteenth Amendment claim, failure to protect, cruel and unusual punishment, due to not receiving medical accommodation, administrative transfer from (GRCC) to (GCC) at or about 2019.

Claim Five:

Failure to protect and cruel and unusual punishment due to retaliation by staff and attacked by inmates and failure to accommodate medically, administrative transfer (GCC) to (GRCC) at or about 2019.

Claim Six:

Deliberate indifference to medical needs, failure to protect. Cruel and unusual punishment, administrative transfer from (GRCC) to (BKCC) medical claims) at or about 2019.

Claim Seven:

Cruel and unusual punishment, failure to protect, medical claims, (deliberate indifference) due to not treating serious medical needs and to accommodate medically at or about 2020.

Marguis R. Wilson #1435580

BKce

P.O. Box 430

Dillwyn, Va. 23936



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Roanoke, Va. 24



States District Court
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011-2208